UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

.

v. : CRIMINAL NO. 19-CR-00125 (ABJ)

:

GREGORY B. CRAIG,

:

Defendant.

NOTICE OF FILING

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully notes the filing of the government's discovery letters, attached hereto as Exhibit A.

Respectfully submitted,

JESSIE K. LIU UNITED STATES ATTORNEY D.C. Bar No. 472845

By: /s/ Fernando Campoamor-Sánchez

FERNANDO CAMPOAMOR-SANCHEZ (DC 451210)

MOLLY GASTON (VA 78506) Assistant United States Attorneys United States Attorney's Office

555 4th Street NW

Washington, D.C. 20530 202-252-7698/202-252-7803

Fernando.Campoamor-Sanchez@usdoj.gov

Molly.Gaston@usdoj.gov

JOHN C. DEMERS ASSISTANT ATTORNEY GENERAL

By: /s/ Jason B.A. McCullough

JASON B.A. MCCULLOUGH (DC 998006; NY 4544953)

Trial Attorney

Department of Justice

National Security Division 950 Pennsylvania Ave NW Washington, D.C. 20530 202-616-1051 Jason.McCullough@usdoj.gov

Certificate of Service

I certify that, by virtue of the Court's ECF system, a copy of the foregoing Notice of Filing has been sent to counsel for the defendant on August 11, 2019.

/s/ Fernando Campoamor-Sánchez
Fernando Campoamor-Sánchez
Assistant United States Attorney

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 1 of 23



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

June 7, 2019

Via File Transfer Portal

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional discovery consisting of the following files.

- Email communication with dated 5/28/2018 (USA-00021159 USA-00021161);
- FD-302 Email communication with (USA-00021162);
- emails with attachments (USA-00021163 USA-00021182);
- Metadata for all SAU documents produced by Skadden (USA-00021183);
- Chart reflecting Bates numbers from Skadden production that were produced twice;
- data sets (USA-REL-1022512 1031529). These are the documents that were returned after running the additional agreed upon search terms with the date limitation;
- FD-302s (USA-00021184-USA-00021349);
- FARA Registration Forms, exp. 2/28/14, (Blank) (USA-00021350-USA-00021374).

These materials are subject to the Protective Order issued by the Court on April 15, 2019. If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU United States Attorney

By: /s/

Fernando Campoamor Sánchez Molly Gaston Assistant United States Attorneys

Jason B.A. McCullough

Trial Attorney, National Security Division

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 3 of 23



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

June 17, 2019

Via File Transfer Portal

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional discovery consisting of the following files.

- Documents from Mercury and Podesta data sets (USA-REL2-0146946-0155662). These are the documents that were returned after running the agreed upon search terms with the date limitation;
- Reproduced chart reflecting Bates numbers from Skadden production with a corrected Bates number (USA-00021375);
- FARA Unit electronic file email review (USA-00021376-00021385);
- SAU Bates labeled documents missing pages (USA-00021386-00021396).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

	Sincerely,
	JESSIE K. LIU United States Attorney
By:	/s/
J	Fernando Campoamor Sánchez

Molly Gaston
Assistant United States Attorneys
Jason B.A. McCullough
Trial Attorney, National Security Division

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 5 of 23



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

June 21, 2019

Via File Transfer Portal

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional discovery consisting of the following files.

- Additional NSD Voluntary Production (USA-REL-1031530-1301926);
- Additional FARA Unit materials; letter & attached statutory supplement dated December 18, 2012(USA-00021397-00021421);
- Interview notes from 2017 9 26 interview conducted by SCO (USA-00021422-00021439);
- FD-302 2017 9 26 telephone call (USA-00021440-00021442);
- Agent notes from telephone call (USA-00021443-00021446).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

	Sincerely,
	JESSIE K. LIU United States Attorney
By:	/s/
J	Fernando Campoamor Sánchez Molly Gaston

Assistant United States Attorneys
Jason B.A. McCullough
Trial Attorney, National Security Division

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 7 of 23



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

June 28, 2019

Via File Transfer Portal

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional FBI FD-302s and agent interview notes (USA-00021447-USA-00021613).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU United States Attorney

By: /s/

Fernando Campoamor Sánchez
Molly Gaston
Assistant United States Attorneys
Jason B.A. McCullough

Trial Attorney, National Security Division

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 8 of 23



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

July 3, 2019

Via File Transfer Portal

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional FBI FD-302s (USA-00021614-USA-00021695).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU United States Attorney

By: /s/

Fernando Campoamor Sánchez Molly Gaston Assistant United States Attorneys Jason B.A. McCullough

Trial Attorney, National Security Division



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

July 10, 2019

Via File Transfer Portal

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional discovery consisting of the following files.

- Additional Podesta Documents (from previous date & time limitation search terms (USA-REL2-0178031-0183068);
- notes from 2019 meeting with FTI (USA-00021696-00021705);
- notes from 2019 meeting with FTI (USA-00021706-00021710);
- interview notes & documents 2017 05 16 (USA-00021711-00021756);
- interview documents 2018 05 17 (USA-00021757-00021794);
- interview documents 2018 05 21 (USA-00021795-00021857);
- attorney's FD-302, notes, documents 2018 06 12 (USA-00021858-00021869);
- FD-302 and agent notes of meeting with FARA Unit regarding hardcopy materials (USA-00021892-USA-00021894);
 - o FARA Unit hardcopy materials (USA-00021870-00021880);
 - o FARA Unit hardcopy materials (SENSITIVE) (USA-00021881-00021891);
- interview notes & documents (USA-00021895-00021973);
- interview notes & documents (USA-00021974-00021986);
- 2018 05 31 interview documents (USA-00021987-00022053);
- 2018 08 20 interview documents (USA-00022054-00022094);
- emails 2012 12 14 and 2013 07 23 reproduced in color version (USA-00022095-USA-00022100).

These materials are subject to the Protective Order issued by the Court on April 15, 2019, and please note that one set of documents includes the SENSITIVE designation under the Order.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU United States Attorney

By: /s/

Fernando Campoamor Sánchez
Molly Gaston
Assistant United States Attorneys
Jason B.A. McCullough

Trial Attorney, National Security Division



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

July 17, 2019

Via File Transfer Portal

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional discovery consisting of the following files.

- 2019 06 27 FD-302 & agent notes (USA-00022101-00022102);
- 12019 06 06 FD-302 & agent notes (USA-00022103-00022148);
- representative contacts 2019 07 11 FD-302 & agent notes (USA-00022149-00022150);
- 2019 06 25 FD-302, agent notes & documents (USA-00022151-00022156);
- 2019 06 14 FD-302 & agent notes (USA-00021757-00022212);
- Handwritten notes that appear on the back of the first page of the document that begins on SAU 281634 (USA-00022213);
- Map of Ukraine (USA-00022214);
- Map of Eastern & Central Europe (USA-00022215);
- Photographs of witnesses (USA-00022216-00022237);
- 2 Google maps of Ukraine (USA-00022238-00022239);
- Photographs of witnesses (USA-00022240-00022241).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU United States Attorney

By: /s/

Fernando Campoamor Sánchez
Molly Gaston
Assistant United States Attorneys
Jason B.A. McCullough
Trial Attorney, National Security Division

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 13 of 23



U.S. Department of Justice

Jessie K. Liu **United States Attorney**

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

July 21, 2019

Via File Transfer Portal

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

> United States v. Gregory B. Craig, 19-cr-001 25 (ABJ) Re:

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed previously produced Skadden documents being reproduced in the native version to include a page that was inadvertently omitted by Skadden, and a document from which the highlighting was omitted. The documents previously produced as USA-REL-0338979 - USA-REL-0338981 and USA-REL-0304816 – USA-REL-0304819, originally produced on April 15, 2019. This document bears Bates numbers USA-00022242 - USA-00022251. Also being reproduced is SAU 281634A, previously produced as USA-00022213 on July 17, 2019.

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU United States Attorney

By:

Fernando Campoamor Sánchez Molly Gaston Assistant United States Attorneys Jason B.A. McCullough

Trial Attorney, National Security Division

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 15 of 23



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

July 23, 2019

Via Email

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

Enclosed with this correspondence is an additional post-indictment discovery production pursuant to Rule 16(c). In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, please find enclosed additional FBI FD-302 (USA-00022252-USA-00022274) and a print version of the *New York Times* article (USA-00022275-00022276).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU United States Attorney

By: /s/

Fernando Campoamor Sánchez Molly Gaston Assistant United States Attorneys Jason B.A. McCullough

Trial Attorney, National Security Division

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 16 of 23



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

July 31, 2019

Via USAfx

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

> Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, please find enclosed additional FBI FD-302 and agent notes for (USA-00022276-USA-00022350) and FBI FD-302 and agent notes for (USA-00022351-00022385).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU United States Attorney

By:

Fernando Campoamor Sánchez Molly Gaston Assistant United States Attorneys Jason B.A. McCullough

Trial Attorney, National Security Division



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

August 2, 2019

Via File Transfer Portal

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, and your previous discovery requests, please find enclosed additional discovery consisting of the following files.

- 2019 07 12 FD-302 & agent notes (USA-00022386-USA-00022453);
- Tabs accompanying previously produced January 31, 2018 FD-302 of (USA-00022454-00022854);
- 2019 01 25 FD-302 (USA-00022855- USA-00022857);
- 2019 01 15 FD-302 (USA-00022858- USA-00022872);
- 2019 01 29 FD-302 (USA-00022873- USA-000<u>22888);</u>
- Various materials obtained from devices or accounts belonging to 00022889-USA-00023573); (USA-
- Notes of SA Daniel Kegl taken during recent trial preparation meetings (USA-00023574-USA-00225667);
- 2019 01 28 FD-302 (USA-00023667-0023686);
- 2019 02 08 FD-302 (USA-00023687-00023701);

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU

United States Attorney

By: /s/

Fernando Campoamor Sánchez Molly Gaston Assistant United States Attorneys

Jason B.A. McCullough

Trial Attorney, National Security Division

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 19 of 23



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

August 4, 2019

Via USAfx

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

> Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, please find enclosed interview documents with notations from SA Daniel Kegl (USA-00023702-00023806).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

Sincerely,

If you have any questions, please do not hesitate to contact us.

JESSIE K. LIU **United States Attorney**

By: $/_{\rm S}/$

Fernando Campoamor Sánchez Molly Gaston Assistant United States Attorneys Jason B.A. McCullough

Trial Attorney, National Security Division

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 20 of 23



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

August 5, 2019

Via USAfx

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, please find enclosed FD-302 2019 07 29 (USA-00023807-00023816) and FD-302 2019 07 24 (USA-00023817-00023823). The agent notes for these interviews were previously produced. Also enclosed is a letter from Gibson Dunn & Crutcher, LLP dated 2019 08 05 (USA-00023824-00023826).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU
United States Attorney

By: /s/
Fernando Campoamor Sánchez
Molly Gaston
Assistant United States Attorneys
Jason B.A. McCullough

Trial Attorney, National Security Division

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 21 of 23



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

August 9, 2019

Via USAfx

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, please find enclosed SA Daniel Kegl's witness trial prep notes (USA-00023827-USA-00023832) and FD-302's (USA-00023833-00023853).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU United States Attorney

By: /s/

Fernando Campoamor Sánchez
Molly Gaston
Assistant United States Attorneys
Jason B.A. McCullough

Trial Attorney, National Security Division

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 22 of 23



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

August 9, 2019

Via USAfx

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, please find enclosed 2018 02 01 FD-302 (USA-00023854-00023876) and SA Daniel Kegl's 2019 08 09 witness trial prep notes (USA-00023877-USA-00023880).

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU United States Attorney

By: /s/

Fernando Campoamor Sánchez Molly Gaston Assistant United States Attorneys Jason B.A. McCullough

Trial Attorney, National Security Division

Case 1:19-cr-00125-ABJ Document 91-1 Filed 08/11/19 Page 23 of 23



U.S. Department of Justice

Jessie K. Liu United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

August 11, 2019

Via USAfx

William W. Taylor, III William J. Murphy Zuckerman Spaeder LLP 1800 M Street NW, Suite 1000, North Tower Washington, DC 20036-5807

Re: United States v. Gregory B. Craig, 19-cr-00125 (ABJ)

Dear Counsel:

In compliance with our discovery obligations under Rule 16 and the Federal Rules of Criminal Procedure, please find enclosed SA Daniel Kegl's witness interview notes (USA-00023881-USA-00023900) and FD-302 reports (USA-00023901-USA-00023920). In addition, please find additional FD-302s (USA-00023921-USA-00023981) that had mistakenly not been previously produced. We are in the process of verifying that all of the 302s have been produced to you.

These materials are subject to the Protective Order issued by the Court on April 15, 2019.

If you have any questions, please do not hesitate to contact us.

Sincerely,

JESSIE K. LIU
United States Attorney

By: /s/
Fernando Campoamor Sánchez
Molly Gaston
Assistant United States Attorneys
Jason B.A. McCullough

Trial Attorney, National Security Division